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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re PARMALAT SECURITIES
LITIGATION,

This document relates to: 07 Civ. 03790

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY, and JOHN
HANCOCK INSURANCE COMPANY OF
VERMONT,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION,
BANK OF AMERICA, N.A., and BANC OF
AMERICA SECURITIES LLC,

Defendants.

MASTER DOCKET

04 MD 1653 (LAK)

**JOINT STIPULATION AS TO
EXPERT DISCOVERY AND
ADDITIONAL FACT DISCOVERY**

This Joint Stipulation applies only to the above-captioned action, which was consolidated in the *In Re Parmalat* MDL proceeding on May 17, 2007.

1. The purpose of this Stipulation is to establish a reasonable time period within which the parties may conduct expert discovery.

2. In a September 12, 2007 Joint Stipulation, the parties agreed to a limited extension of the fact discovery period from September 21, 2007 until October 25, 2007, for depositions only. That Joint Stipulation was endorsed by the Court on September 18, 2007.

3. As part of that Joint Stipulation, the parties agreed that prior to the conclusion of the fact discovery period they would consult with one another and thereafter make application to

the Court with respect to reasonable deadlines for the exchange of expert reports, the completion of expert discovery, and the filing of dispositive motions, if any.

4. After such consultation, the parties have agreed to the following expert schedule, pending the Court's endorsement:

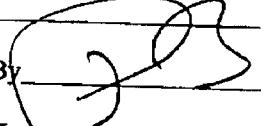
- Initial Reports Exchanged: February 15, 2008
- Rebuttal Reports Exchanged: March 28, 2008
- Completion of Expert Discovery: May 16, 2008

5. With respect to dispositive motions, the parties will confer prior to the close of expert discovery and thereafter submit a proposed schedule to the Court.

6. Additionally, the parties ask that the Court extend the fact discovery period in this action solely for the purpose of allowing Bank of America to serve an additional set of interrogatories intended to cover a limited number of topics, which topics were originally part of the Bank's 30(b)(6) notice.

7. As part of an agreement to limit the scope of the Bank's 30(b)(6) deposition of John Hancock, which deposition took place on October 25, 2007 and was the subject of negotiation between the Bank and John Hancock, the parties agreed that the Bank would serve a set of additional interrogatories on selected topics upon the Court's approval. The parties have agreed to the form of those interrogatories.

November 13, 2007

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*No further action
lh*

Lewis A. Kaplan
United States District Court Judge

11/13/07